

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In re:

Daryl Fred Heller

Chapter 11

Case No. 25-11354 (JNP)

Debtor.

**LIMITED OBJECTION TO MOTION OF ACCORDO LIMITED PARTNERSHIP FOR
AN ORDER AUTHORIZING THE SALE OF REAL PROPERTY LOCATED IN ELK
CITY, KANSAS AND BEARING PARCEL NUMBERS S12, T32, R12E CONSISTING
OF 64.4 ACRES, S2, SE4 LY S OF CO RD LESS ROW PURSUANT TO THE MARCH
14, 2025 AMENDED CONSENT ORDER PRESERVING STATUS OUO**

Deerfield Capital, LLC (“Deerfield” or “Movant”) asserts the following Limited Objection to the entry of an order authorizing Accordo Limited Partnership (“Accordo”) to sell the real property located in Elk City, Kansas and bearing parcels nos. S12, T32, R12E consisting of 64.4 acres, S2, SE4 LY S of Co Rd Less Row (the “Property”) and in support thereof avers as follows:

1. Deerfield Capital, LLC (“Deerfield”) is a limited liability company formed and operating in the Commonwealth of Pennsylvania, with a mailing address of 16 Deerfield Road, Lancaster, PA 17603. Deerfield is a secured creditor of the Debtor.
2. Deerfield does not object to the sale of the Property or the payment of any secured creditors or closing costs in order to effectuate the sale of the Property.
3. Deerfield does object to the distribution of any of the balance of the sale proceeds.

4. Deerfield has filed a separate adversary action against Accordo and other parties with regard to alleged fraudulent transfers that involve the Debtor.

5. On or about March 14, 2025, this Court entered a Consent Order preserving the Status Quo (the "Status Quo Order"). *See D.N. 119.*

6. The purpose of the Status Quo Order was to prevent the distribution of **any** proceeds absent further Court Order to ensure that parties have a valid and legal claim.

7. As such, Deerfield reserves all rights, remedies, and claims, including, but not limited, to any proceeds owed or sought to be distributed to any party.

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